

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Vigilant LLC,)	Case No. 1:25-cv-00238
)	
Plaintiff,)	District Judge Douglas R. Cole
)	
v.)	
)	
Helzberg's Diamond Shops, LLC,)	
)	
Defendant.)	
)	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff Vigilant LLC ("Plaintiff") and Defendant Helzberg Diamond Shops, LLC ("Defendant"), pursuant to Fed. R. Civ. P. 26(c), jointly submit this Motion for Entry of Agreed Protective Order and request this Court enter the Agreed Protective Order attached as **Exhibit 1** to prevent the public disclosure of certain confidential business and personally-identifying information designated as confidential by the parties.

Respectfully submitted,

/s/ Katherin A. Rasmussen (per authorization)

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2025, a copy of the foregoing was filed with the Court's electronic filing system and will be served on all parties via the Court's electronic filing system.

/s/ Sanna-Rae Taylor